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February 21, 2024

VIA ECF

The Honorable LaShann DeArcy Hall
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Yerkyn v. Yakovlevich, et al.*
Case No.: 23-cv-2399-LDH (E.D.N.Y.)

Dear Judge DeArcy Hall,

We write on behalf of defendant the National Security Committee of the Republic of Kazakhstan ("NSC") to oppose Plaintiff's request for yet another extension of time, this time to file a reply brief on his motion to file a Second Amended Complaint.

This is at least the third request for an extension of time by Plaintiff. There is nothing new or different in Plaintiff's motion or proposed amended complaint that is relevant to the jurisdictional defenses asserted by the NSC in this case, defenses not even addressed in Plaintiff's motion. Plaintiff has never presented a credible argument to rebut the NSC's assertion of sovereign immunity and no amount of additional time will result in such an argument.

We respectfully assert that the request for an extension be denied.

Respectfully submitted,

s/ Joseph D. Pizzurro

Joseph D. Pizzurro

cc: All Counsel of Record – By ECF